

Docket No. 05-015-1
Regulatory Analysis and Development, PPD
APHIS, Station 3C71
4700 River Road Unit 118
Riverdale, MD 20737-1238

Re: Docket No. 05-015-1

On behalf of the Nevada Cattlemen's Association I am submitting comments with regard to the National Animal Identification System (NAIS). There is little doubt that an animal identification system in the United States will become a reality within a few short years. The impact of the NAIS currently being developed by the USDA will be more directly felt by the industry than any other stakeholder engaged in the process. Therefore, it stands to reason that the industry should control the system since the largest impact of the NAIS, both positively and negatively, will be borne by the industry. As a result, it is in the best interest of the entire beef industry for the NAIS to be developed and managed by the industry in a way that is effective, efficient, and cost effective. The system, which is developed, must mirror the marketplace, provide the government with animal health information as necessary, and maintain the confidentiality of producer information.

Database

The NAIS database, which will be the backbone of the NAIS, must be created and supported by all segments of the cattle industry. The database should be developed, managed, and maintained by private industry. This will provide an opportunity to minimize the barriers of compliance, more likely mirror the natural flow of commerce, enlist the most efficient technology available, and evolve as the industry evolves; and, provide the animal health authorities with the information they require in a timely manner. The official animal health authorities should have immediate access to the information within the system that is relevant to that particular animal health risk. If at the end of the day the NAIS database does not provide this functionality the NAIS cannot be considered successful. Ultimately, however, the industry will bare the costs of the implementation and the infrastructure of the NAIS, and therefore should play the lead role in the development of a system that will provide reliable and functional information to animal health authorities while meeting the industry's ever changing needs.

Another concern and reason for a privatized managed and maintained database is the compliance of **confidentiality**. Whether real or perceived, producers have a concern that a government database will expose the industry to additional liability and risk. On the other hand, a private industry controlled database adds an additional firewall to protect the producer information recorded in the database and would be more accepted by the industry. At the same time, an industry-controlled database would in no way limit the information that could be provided to federal and state animal health authorities when needed.

Group Lot Identification

One of the most important options for tracking animal movements is group lot tracking, utilizing brand inspections, yet the current NAIS plan all but dismisses its use for the cattle industry. During the past year Nevada Cattlemen's Association has participated in the Northwest Pilot Project, (NWPP) which has shown that group lot tracking is an efficient and effective method of identification for various segments of the industry in various scenarios. Although it does not work in all situations it may be the only way the NAIS will work in many situations.

In many areas of the country, and particularly in the West, cattle are currently moved, handled, and sold in groups, utilizing brands as identification. Often ranchers handle their cattle only once during their lifetime and many of the shipping locations have limited or not physical facilities for cattle handling. At times reading an RFID tag in a remote location is difficult at best and often impossible. Groups of animals are moved from one area to another and uniquely identifying individual animals is virtually impossible without a serious change in the way business is conducted. Group lot animal identification mirrors the natural flow of business and how business is conducted by these producers.

Group Lot identification is a concept that is not foreign to Western ranchers. Recording the movement of cattle using brands is a well-established group identification method in the west. You might ask what about the commingling of cattle. The key is to require the producer that is commingling a set of cattle in a group lot to individually identify those cattle before commingling. Through our participation with NWPP we have been able to show that group lots work and although it will not work in some instances it may be the only way cattle can be identified in some circumstances.

In summary, the key issues to keep in mind when developing the NAIS are: Compliance of confidentiality, the cost to the industry, who will manage the database and the flexibility of the NAIS. It is paramount that we develop practical solutions for all of the above.

Sincerely,

Preston Wright

President